Department of Toxic Substances Control

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ALAMEDA POINT
SSIC NO. 5090.3

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October 15, 2002

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DRAFT REMEDIAL INVESTIGATION REPORT, SITES 14 AND 15, OPERABLE UNIT 1, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Ms. Clark:

The Department of Toxic Substances Control (DTSC) has completed the review of the above referenced remedial investigation (RI) report for Sites 14 and 15 prepared by Tetra Tech EM Inc. and submitted by the Navy on August 15, 2001. Our comments are attached. Please contact me at 510-540-3767 if you have any questions.

Sincerely,

Marcia Y. Liao

Marcia Y. Liao, Ph.D., CHMM
Hazardous Substances Engineer
Office of Military Facilities

Enclosures

cc: see next page

cc: Michael McClelland, SWDiv
Andrew Dick, SWDiv
Steve Edde, Alameda Point
Anna-Marie Cook, EPA
Judy Huang, RWQCB
Charlie Huang, DFG
Elizabeth Johnson, City of Alameda
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Michael John Torrey, RAB Co-Chair
Lea Loizos, Arc Ecology

DTSC COMMENTS
DRAFT REMEDIAL INVESTIGATION REPORT
SITES 14 AND 15
ALAMEDA POINT, ALAMEDA, CALIFORNIA

Part I: Comments from Office of Military Facility (OMF)

GENERAL COMMENTS

1. This RI lacks sufficient tables summarizing the chemical data of the investigation results. This has made the review tedious and difficult. For instance, the RI reports that soil samples were collected at or around Building 26/GAP 11 during the Environmental Baseline Survey (EBS) and that further assessment was not required (page 4-5). To independently verify it, the reviewer has to first go to Figure 3-6 to figure out that there have been two soil samples (003-Z02-002 and 003-001-001) taken in the vicinity of Building 26/GAP 11. Appendix E will then have to be examined to locate the respective data to draw the conclusion.

   Between the statistical summary tables (Tables 4-1 through Table 4-4) and complete analytical results (Appendix E), please provide appropriate chemical summary tables to facilitate the review. Please make sure all soil gas data collected to date are included.

2. Page 3-19 states that only constituents with greater than a 10 percent detection frequency and a maximum detected concentration of more than the PRG are discussed in detail in the RI. Throughout this RI numerous chemicals or classes of chemicals were reported as non-detects and left out from further discussion. In almost all instances, detection limits were not specified and the reviewer had to wade into Appendix E to look for the detection limits. This makes it difficult to determine if a non-detect is truly indicative of absence of the chemical or if it is merely an artifact of a high detection limit.

   Please examine the detection limits for all non-detects and report the detection limit whenever a constituent or a group of constituents is excluded for discussion in the RI. We believe any non-detect with a detection limit higher than the respective PRG should still be included for discussion in the RI.

3. The evidence available at this time does not appear to be fully supportive of the conclusion that at Site 14 the former fire training area (FTA) is the only source of CERCLA releases. Our specific concerns are as follows:

   Building 26/GAP 11

GAP 11, according to Figure 2-8, is located about 30 ft west of Building 26 and the two sites appear to have been involved with activities of different nature. It is perhaps more appropriate that these two locations are discussed separately.

Building 26

Building 26 was not inspected during the EBS because of the classified materials stored inside. It is our opinion that Building 26 qualifies as a solid waste management unit (SWMU) under RCRA and should be assessed for potential releases.

GAP 11

The RI correctly quotes the DTSC 1999 letter that states, "Based on the results, GAP 11 may be eliminated from the Navy list of GAP sites that require further assessment". But it neglects to mention that the same letter also says, "Please include the data in RI report to support conclusions regarding the potential sources in the IR site". Please provide it accordingly.

Also, please be advised that the DTSC 1999 letter stress that DTSC regards the assessment interim and that DTSC does not consider the determination final until a formal determination pursuant to the National Contingency Plan has been completed.

Buildings 120, 121, 122, and 388

Buildings 120, 121, 122 and 388 are Quonset huts constructed in 1940s and 1950s. The floors of the buildings are gravel or bare soil. Solvents, petroleum hydrocarbons, or metals were reportedly stored or handled inside or near these buildings. Stains were observed on the floors during the EBS inspection.

Soil, groundwater and soil gas samples were collected within the buildings and the open spaces near the buildings. Please provide a chemical summary table to help the reviewer determine if the existing data is sufficient and if Buildings 120, 121, 122 and 388 are potential sources of contamination.

Former Building 179/AST S96A

Building 179

The RI states that a concrete transformer pad and generator were located in Building 179 and that Building 179 was at least for some time used as a

storage for abandoned electrical equipment. It is not clear if Building 179 was ever used for storage of PCB articles. Please discuss the likelihood of PCB releases at or around Building 179.

Soil and groundwater samples were collected near the building, but not inside the building. Please provide a table summarizing the investigation results to assist the reviewer determines if the existing data is sufficient and if Building179 is a potential source of contamination.

AST S96A

An aboveground storage tank, S96A, was reportedly associated with Building 179. It is unclear how far S96A was from Building 179, what materials were stored in it, what function it had served, and what had happened to the tank. Please explain.

Former Buildings 206, 207, 83, 443, 597

Please provide pertinent records to demonstrate more conclusively that Buildings 206 and 207 were used as crew shelters and for training (page-18), Building 83 was offices (page 2-16), and Building 443 was a training facility (page 2-18) and that none of these buildings was involved in the handling of chemicals.

Please disclose the past use of Building 597 and approximate its location on the map.

Former Building 528/GAP 9

Building 528 was used as a heavy equipment and vehicle maintenance shop. The wastes generated from the maintenance activities were stored at two nearby sheds and the adjacent open space. The waste accumulation area, designated as GAP 9, is unpaved and measures about 20 ft by 10 ft. There was no secondary containment to the waste storage area and chemical staining was present near the building.

Soil and groundwater samples were collected near the building, but not inside the building. Please provide a table summarizing the investigation results to help the reviewer determine if the existing data is sufficient and if Building 528/GAP 9 is a potential source of contamination. Also, for clarity, please locate the two storage sheds on the map. Please consider depicting GAP 9 as a contiguous waste storage area rather than two separate waste accumulation points.

Please provide some discussion for the aboveground storage tank, S528. For example, how far was it from Building 528? What materials were

stored in it? What function it had served? What had happened to the tank?

CAA-2

It is our understanding that a request for no further action (NFA) has been submitted to RWQCB regarding CAA-2 and that RWQCB's decision is pending. Because no data pertinent to the NFA is contained in this RI, we cannot conclude at this time if CAA-2 is or is not a source of contamination (also see Comment # 7).

Open Space

Soil and groundwater water samples were collected from the open space during the EBS and RI. Please provide a table summarizing the investigation results to help the reviewer determine if the existing data is sufficient and if the open space is a potential source of contamination.

Storm Sewers

There are two stretches of storm sewers present at Site 14 (Figure 2-8). One stretch leads to Outfall W. The other goes to an unnamed outfall. Both sewer lines are located in the northwestern portion of Site 14. Page 2-20 states, "The condition of the storm sewer lines along the eastern and northern boundaries of the site have been determined to be in sound condition, and the condition of the lines along the western boundary is unknown". It is unclear which stretch is referred as the "eastern and northern" sewer line and which is the "western" one. Please clarify.

It appears that investigations have been conducted on sewer lines leading to Outfalls W and BB (Outfall BB is for sewers located in the buffer zone east of Site 14; see pages 4-8 and 4-9 and Figure 2-8) but not on the stretch leading to the unnamed outfall. Please clarify.

Also, please discuss the number of catch basins present in Site 14. Have any of them been sampled? What are the sampling results?

Former Fire Training Area (FTA)

Please discuss any sampling results of the backfill material brought into the fire training area after the removal action.

4. The evidence available at this time does not appear to be fully supportive of the conclusion that at Site 15 the former Buildings 283, 301, and 389 and surrounding open space are the only sources of CERCLA releases. Our specific concerns are as follows:

Building 27

Building 27 was operated as a sewer lift station and maintenance shop. Materials stored in the building included petroleum products and biocide (page 2-20). It is unclear if the ground was paved and if any stains were present before the buildings were removed.

EBS samples were collected in the vicinity of the building. Please provide a chemical summary table to help the reviewer determine if the existing data is sufficient and if Building 27 is a potential source of contamination.

Former Buildings 283, 301 and 389

Please discuss any sampling results of the backfill material brought into the former PCB storage area after the removal action.

Former Railroad Spur

Page 4-15 states, ".... Soil samples were collected in the vicinity of the railroad spur during the RI to further delineate the boundaries of lead and PCB-impacted soils in support of a planned removal action (se Figure 3-3). Samples were non-detected for PCBs and lead, and the railroad spur is not considered a significant source of CERCLA constituents".

Figure 3-3 depicts nine sampling locations, S15-47 through S15-55, along the presumed railroad spur. A review of the respective sampling results (Appendix E) indicates that PCBs was actually present at the railroad spur at levels as high as high as 52,000 ug/kg. This is contrary to what page 4-15 states.

We understand that soils in the vicinity of locations S15-47 through S15-55 was later excavated as part of the 1994/1995 removal action. But clearly the railroad spur data should be summarized and re-evaluated to determine if the existing data is sufficient and if the railroad spur is a potential source of contamination.

Open Space

Approximately one-fourth, or 1.5 acres, of Site 15 appears to be open space where no samples have been collected. Please describe the past use of these areas to support the notion that sampling was not necessary and that these areas are not potential sources of contamination. Ground maintenance such as weed or dust control should be discussed.

Wetland

A delineated wetland of approximate one acre is present along the margin of Site 15. The Department of Fish and Game (DFG) along with DTSC are co-trustees. Please include DFG in any future submittal of Site 15 documents.

Storm Sewer Line

Page 2-21 states, "Storm sewer lines are present in the western portion of Site 15 and are in sound condition (Tetra Tech 2000a)". For clarity and ease of review, please include pertinent data from the previous report.

5. The EBS and RI did not always include inside building sampling. Samples taken in the vicinity of the buildings are in some cases quite far away from the respective building. For example, up to six soils samples were collected in the general vicinity of Building 27 during the EBS. But the sampling locations ranged from 25 to 120 ft away from the building. Building 27 itself, on the other hand, is approximately 42 ft by 42 ft.

It is our opinion that with the help of appropriate chemical summary tables, a review should be performed building by building to determine if sampling inside the building and its immediate vicinity is necessary.

6. Many statements in this RI require substantial crosschecking. Examples include, but are not limited to:

- Page 2-20: "The condition of the storm sewer lines along the eastern boundaries of (Site 14) have been determined to be in sound condition (Tetra Tech 2000a)".
- Page 2-18: "In a letter from DTSC ....(DTSC 1999).... GAP 11 may be eliminated from the Navy's list of GAP sites that require further assessment".
- Page 2-16: "Building 83 ..... was used for office space".
- Page 4-8: "Results were summarized in the storm sewer pathway evaluation included in the data summary report supplemental RI data gap sampling for OUs 1 and 2 (Tetra tech 2002c)".

We believe RI, being a primary document that subsequent site cleanup decisions are based upon, needs to be inclusive. It should contain sufficient details of findings from previous studies. When earlier reports or decision criteria (e.g. the pink, yellow and blue ambient data) are referred, the status of agencies' concurrence should be clearly stated. General

qualifying statements with a mere citation or, worse, no citation at all should be avoided.

7. It appears that there are two documents prepared under the TPH program for Site 14. One was a request for No Further Action (NFA) which is for CAA-2. RWQCB's review is pending. The other was a risk screening report for the remainder of Site 14 excluding CAA-2. This risk screening report is included in this RI as Appendix F.

   Please explain/clarify the following:

   - Why the NFA request is not included in this RI ?
   - What is the intended use of the risk screening report (i.e. Appendix F)? This RI has a section (Section 5) dedicated to risk assessment. Why a risk screening performed only a portion of the site should be included?
   - Page 4-1, "According to the TPH evaluation (Appendix F), no further action for TPH in soil and groundwater is necessary" is potentially misleading. Please consider revising it.

8. Please discuss the potential source(s) of the groundwater contaminant plumes.

SPECIFIC COMMENTS

1. Page 2-16, paragraph 2: Fuel lines, storm sewers and sanitary sewers straddle Parcels, 16B, 17 and 23D, i.e., the buffer zone. What is the environmental status of these parcels?

2. Page 2-16, paragraph 3: Table 2-3 should be Table 2-1 instead.

3. Page 2-19, paragraph 3: TPH and RCRA are two different regulatory programs with different agency oversights. Please do not refer them as "the TPH/RCRA program".

4. Pages 2-19 states,"The tanks were abandoned by filling with soil and possibly other materials". Please discuss what these other materials were.

5. Conceptual site model (section 4.3) is an element for risk assessment and may be better incorporated in Section 5. Please consider moving it.

6. Table 3-1 indicates that earlier environmental investigation was conducted at Site 15 in 1985 by Wahler Associates. Section 4.2 of the report (see

page 4-13) reiterates it. But none of the 1985 study results is included in this RI report.

Please determine if the 1985 study is relevant to this RI. Investigation results, if relevant, should be summarized and presented in the RI. If deemed irrelevant, they should be deleted.

7. Table 3-4 suggests the surface sampling (e.g. S15-S16) depicted in Figure 3-5 are part of the 1994 follow-on investigation, not the 1995 removal action confirmation sampling. If Table 3-4 is correct, the surface sampling locations shown in Figure 3-5 should be depicted in Figure 3-3 instead. Please correct it.

8. Figure 2-9 is missing from DTSC's copy of the report.

9. Figure 3-2 should be the soil and groundwater sampling location map for Site 14 remedial investigation. But the Figure 3-2 included in DTSC's copy of the RI report is entitled "Site 14 Water TPH Sampling Locations" which is an error. Please minimize this kind of errors.

10. On the maps please consider differentiating current site features from features that no longer exist (e.g. railroad spur at Site 15) or are uncertain of their locations (e.g. Building 597 at Site 14).

11. Please paginate Appendix E.

Part II: Comments from Human and Ecological Risk Division (HERD)

Please see the attached memorandum, dated September 19, 2002, prepared by Dr. Jim Polisini.

ATTACHMENT

REVIEW AND COMMENTS ON THE DRAFT REMEDIAL INVESTIGATION REPORT COMMENTS FROM HUMAN AND ECOLOGICAL RISK DIVISION (HERD)

DATED 19 SEPTEMBER 2002

IS ENTERED IN THE DATABASE AND FILED AT ADMINISTRATIVE RECORD NO. **N00236.001918**